

EXHIBIT 1



August 3, 2018

VIA EMAIL

Carol Rendon, Esq.
Baker Hostetler
Key Tower, 127 Public Square
Cleveland, OH 44114
crendon@bakerlaw.com

Re: *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804
The County of Cuyahoga, Ohio, et al. v. Purdue Pharma L.P., et al.; Case No. 17-md-2804

Ms. Rendon,

We write on behalf of Cuyahoga County and bring to your attention concerns that have arisen on the part of our client related to your current role in *In Re National Prescription Opioid Litigation*; Case No. 17-md-2804 and your prior role as United States Attorney for the Eastern District of Ohio and the head of the *Opioid Task Force*.

By way of background, and as an explanation for writing this letter at this time, I would like to point out that in the last few months we have been involved in the massive undertaking related to the review and production of documents in the MDL. Further, it is now quite evident that Defendants intend to raise as defenses that Cuyahoga County was not diligent in addressing the opioid epidemic and that intervening causes, unrelated to the marketing or distribution of opioids, caused the epidemic in the County.

Most recently, during our document collection efforts, we have repeatedly come across many instances where you are referenced in emails as either author or recipient of documents. We assume this issue is not be a surprise to you given your close interaction with Cuyahoga officials during the opioid crisis, but from our standpoint it did surprise us when we identified over 750 separate documents where your name shows up. Additionally, the documents appear to suggest that you either lead or participated in meetings and conferences with current and former employees of Cuyahoga County involving issues directly related to the claims in this litigation. Because of your personal involvement with our clients it is very concerning and appears to suggest you may be called upon as a fact witness in this litigation.

We request a meet and confer concerning your interactions with Cuyahoga County as U.S. Attorney for the Northern District of Ohio. Also, we request that you provide us with all ethics



opinions, if any, concerning your representation of a Defendant in this litigation.

Sincerely,

Napoli Shkolnik PLLC

/s/ Hunter J. Shkolnik

Hunter J. Shkolnik
Salvatore C. Badala
Joseph L. Ciaccio